

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUDITH STRICKLAND, Derivatively On
Behalf of Nominal Defendant CHINA
NORTH EAST PETROLEUM HOLDINGS
LIMITED,

Plaintiff,

v.

WANG HONGJUN, YU LIGUO, ROBERT C.
BRUCE, EDWARD M. RULE, LI JINGFU,
ZHANG YANG DIO, JU GUIZHI,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-05445 (MGC)

[Captions continued on following page]

**NOTICE OF PLAINTIFFS' MOTION TO AMEND OR ALTER JUDGMENT
PURSUANT TO RULE 59(e) OF THE FEDERAL
RULES OF CIVIL PROCEDURE**

SHERWIN DROBNER,

Plaintiff,

v.

WANG HONGJUN, , ROBERT C. BRUCE,
EDWARD M. RULE, LI JINGFU, YU LIGUO,
JU GUIZHI, ZHANG YANG DIO

Defendants,

- and -

CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-06319 (MGC)

JONO NICOLN, derivatively on behalf of
CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Plaintiff,

v.

WANG HONGJUN, ZHANG YANG DIO, JU
GUIZHI, YU LIGUO, ROBERT BRUCE,
EDWARD RULE, RUISHI HU, and LI
JINGFU,

C.A. No. 1:10-cv-06344 (MGC)

Defendants,

- and -

CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Nominal Defendant.

PLEASE TAKE NOTICE THAT plaintiffs Judith Strickland, Sherwin Drobner, and Jono Nicln will move this Court on May 30, 2011 at 10:00 a.m. for an Order altering or amending the judgment entered on May 27, 2011, pursuant to Rule 59(e) of the Federal Rules of Civil Procedure, to afford Plaintiffs an opportunity to effect service of process upon Wang Hongjun, Zhang Yang Dio, Ju Guizhi, Yu Liguo, Edward Rule, Ruishi Hu, And Li Jingfu in the People's Republic of China pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, Nov. 15, 1965, [1969] 20 U.S.T. 361, T.I.A.S. No. 6638.

Dated: Garden City, New York
June 1, 2011

RIGRODSKY & LONG, P.A.

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Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I, Timothy J. MacFall, certify that on this 1st day of June 2011, I caused true and correct copies of:

- NOTICE OF PLAINTIFFS' MOTION TO AMEND OR ALTER JUDGMENT PURSUANT TO RULE 59(e) OF THE FEDERAL RULES OF CIVIL PROCEDURE
- MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' MOTION TO AMEND OR ALTER JUDGMENT PURSUANT TO RULE 59(e) OF THE FEDERAL RULES OF CIVIL PROCEDURE
- DECLARATION OF TIMOTHY J. MACFALL IN SUPPORT OF PLAINTIFFS' MOTION TO AMEND OR ALTER JUDGMENT PURSUANT TO RULE 59(e) OF THE FEDERAL RULES OF CIVIL PROCEDURE

to be served via (i) via first class mail and (ii) electronically upon the following:

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/s/ Timothy J. MacFall
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